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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRIDGETT DAHL, an individual,

Plaintiff,

v.

JACOB MANDRUSIAK a/k/a JAKE
MANDRUSIAK, an individual; DOES 1-10,
unknown individuals; and ROE COMPANIES
1-10, unknown business entities,

Defendants.

Case No.: 2:18-cv-02225-APG-DJA

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR JOINT
PRETRIAL ORDER**

Plaintiff Bridgett Dahl ("Plaintiff") and Defendant Jacob Mandrusiak ("Defendant") (together, the "Parties"), by and through their respective counsel of record, hereby submit this Stipulation and Order to Continue the Deadline for Joint Pretrial Order (the "Stipulation").

The Parties first stipulated to extend the discovery deadlines, which was filed on March 13, 2019 (ECF No. 10), and the Order granting said stipulation was filed on March 26, 2019 (ECF No. 11). The Parties entered into a second stipulation for an extension of time on May 9, 2019 (ECF No. 13), and the Order granting said stipulation was filed on May 14, 2019 (ECF No.

1 16). The Parties entered into a third stipulation for an extension of time on August 13, 2019
2 (ECF No. 38), and the Order granting said stipulation was filed on August 14, 2019 (ECF No.
3 40). The Parties entered into a fourth stipulation for an extension of time on August 27, 2019
4 (ECF No. 41) and the Order granting said stipulation was filed on August 28, 2019 (ECF No.
5 42). And most recently, the Parties entered into a fifth stipulation for an extension of time on
6 September 5, 2019 (ECF No. 43) and the Order granting said stipulation was filed on September
7 6, 2019 (ECF No. 44).

8 On August 14, 2019, Defendant filed a Motion for Summary Judgment ("MSJ") (ECF
9 No. 39). On September 18, 2019, Plaintiff filed her Opposition to Defendant's MSJ (ECF No.
10 46). And on October 2, 2019, Defendant filed his Reply regarding his MSJ (ECF No. 47).

11 On September 13, 2019, Plaintiff filed a Motion for Partial Summary Judgment
12 Regarding Liability ("MPSJ") (ECF No. 45). On October 2, 2019, Defendant filed his
13 Opposition to Plaintiff's MPSJ (ECF No. 48). And on October 16, 2019, Plaintiff filed her Reply
14 in Support of her MPSJ (ECF No. 49).

15 On May 28, 2020, the Court made its decision on the Parties dispositive motions. The
16 Court filed Orders denying Defendant's MSJ (ECF No. 57) and Plaintiff's MPSJ (ECF No. 58).
17 Pursuant to Local Rule 26-1(b)(5), the deadline for the Parties to file a joint pre-trial order is
18 thirty (30) days after its decision on the dispositive motions, which is June 29, 2020. However,
19 due to scheduling conflicts for Plaintiff's counsel and based upon the likely delay in a trial date
20 from the ongoing jury limitations as a result of the COVID-19 pandemic, the Parties request that
21 the deadline to file their joint pre-trial order be extended **two weeks**.

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The new deadline would be as follows:

| Event/Deadline | Current Date | New Date |
|-----------------|---------------|---------------|
| Pre-Trial Order | June 29, 2020 | July 13, 2020 |

Dated this 25th day of June, 2020.

Dated this 25th day of June, 2020.

SEMENZA KIRCHER RICKARD

WILSON ELSEER MOSKOWITZ EDELMAN
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/s/ Jarrod L. Rickard

/s/ Michael P. Lowry

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Attorneys for Plaintiff Bridgett Dahl

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: June 26, 2020